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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

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12 *In re Wells Fargo Mortgage Discrimination  
Litigation.*

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Case No. 3:22-cv-00990-JD

Honorable James Donato

**STATUS REPORT NO. 2 OF INTERIM  
LEAD COUNSEL FOR PLAINTIFFS**

1 Plaintiffs, by and through undersigned counsel, respectfully submit this Status Report No.  
2 of Interim Lead Counsel (“ILC”).

3 1. Since the filing of Status Report No. 1 on March 9, 2023, the parties have  
4 stipulated to a protective order and an order regarding discovery of electronically stored  
5 information (ESI). Dkts. 116 and 117. The Court entered its order approving the stipulations on  
6 April 7, 2023. Dkt. 118.

7 2. On April 20, 2023, the parties held their Rule 26(f) conference wherein the parties  
8 met and conferred to discuss in detail all aspects of discovery and the topics set forth in the parties  
9 Joint Case Management Statement and Rule 26(f) Report, which will be filed on or before May  
10 18, 2023. As part of this process, the parties have continued to work collaboratively regarding the  
11 identification and production of specific data requests Plaintiffs have made to Defendant as part of  
12 the Rule 26 process, and, in fact, have reached agreement on nearly all of the data fields that will  
13 be provided by Defendant. The parties still need to determine whether they are in agreement on  
14 the scope of the collection, and Defendant has indicated that there could be complications with the  
15 data that arise as the data is pulled that could raise issues as to burden and proportionality.  
16 Defendant has also indicated that the data can be supplemented with additional fields as needed.  
17 The parties estimate this data will take six to nine months to produce once the parties determine  
18 the appropriate scope of the initial collection.

19 3. Following the Rule 26(f) conference, Plaintiffs served their initial disclosures on  
20 May 2, 2023, and Defendant served its initial disclosures on May 4, 2023.

21 4. On May 2, 2023, the parties filed a Stipulation of Dismissal with Prejudice of  
22 Defendants Wells Fargo & Co. and Wells Fargo Mortgage. Dkt. 119.

23 5. On May 10, 2023, Plaintiffs served on Defendant Plaintiff Gia Gray’s First Set of  
24 Interrogatories, Plaintiff Aaron Braxton’s First Set of Interrogatories, and Consolidated Plaintiffs’  
25 First Set of Requests for Production of Documents.

26 6. On May 10, 2023, the parties also filed a stipulation regarding Wells Fargo’s  
27 responsive pleading. Dkt. 120. In its stipulation, the parties agreed that Wells Fargo would file its  
28 answer to the Consolidated Complaint on or before May 17, 2023.

1           7. Consistent with the Court’s directive and orders regarding billing practices and  
2 guidelines, on April 21, 2023, undersigned counsel finalized billing records for the month of  
3 March 2023. Undersigned counsel has also received invoices from all Plaintiffs’ counsel for all  
4 work performed from inception through February 28, 2023. Undersigned counsel has promised to  
5 review and provide his comments, reductions and approvals for those fees by May 31, 2023.

6                   8.       The Case Management Conference with the Court is on calendar for May 25, 2023,  
7 at 10:00 am.

ELLIS GEORGE CIPOLLONE  
O'BRIEN ANNAGUEY LLP

By: /s/ Dennis S. Ellis

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